REMARKS/ARGUMENTS

Claims 1-12 are pending in the present application. None of the claims were amended in this response.

Claims 1-2 and 8 were rejected under 35 U.S.C. §102(e) as being anticipated by *Hui et al.* (US Patent App. 2002/0073027). Claims 3-7 and 9-12 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Hui et al.* (US Patent App. 2002/0073027) in view of *Hoffberg* (US Patent 6,850,252). The Applicants respectfully traverse these rejections. Favorable reconsideration is respectfully requested.

The cited art, alone or in combination, does not disclose "displaying graphically coded output information, via the image output device, suitable for authenticating a user" and "reading the graphically coded output information into the trader station by an image reading device" as recited in claim 1, and similarly recited in claim 12.

As argued previously, Hui discloses a mobile payment system, where a salesperson registered at an operation center receives a payment request in an operation center, wherein the transmission of the payment request is carried out via a communication network (see steps recited in [0017], [0027], [0055] and [0058]). Hui teaches that the operation center requests the customer ID (i.e. the WAP phone) of the customer and the transaction amount by the operation center through the communication terminal 40; and entering the customer ID of the customer and the transaction amount to be paid by the customer to the registered merchant through the communication terminal 40 ([0044-45]). The customer ID and the transaction amount is received from the registered merchant by the operation center and the identity of the registered merchant is verified by checking a merchant database by the operation center. A transaction request is then pushed to the communication device (i.e. the WAP phone) of the customer using WAP 1.2 push architecture when the identity of the registered merchant is valid and the transaction amount does not excess the payable limit of customer's account ([0049-51]). Thus, under the communication network of Hui, the salesperson is required to process a transmitted customer ID wherein the customer must also be registered at the operation center. The operation center checks whether or not the salesperson is authorized. The operation center confirms the payment request in that the customer is informed and the operation center demands verification from the customer. There is <u>no disclosure of graphically encoding data via an image reading</u>

device, nor is there a display of authentication of a user on the basis of graphically encoded information.

In the Response to Arguments, the Office Action relies on paragraphs [0036] and [0046] for the aforementioned features, however this reliance is misplaced. Regarding both of these paragraphs, the teaching in Hui merely discloses that graphics and text inputs may be made by users by incorporating WAP-related technology. Nothing whatsoever is disclosed in these, or any other passages in Hui, that teach or suggest displaying graphically coded output information, via the image output device, **suitable for authenticating a user**, and **reading** the graphically coded output information into the trader station **by an image reading device**. As discussed above, the authentication of Hui is completely predicated on the use of customer IDs and have nothing to do with graphical coding and reading of authenticating information (the Office Actions still fail to point out where authenticating data is graphically encoded and subsequently "read" at an image reading device). As was argued previously, the presently claimed graphical authentication can be read into a sales station with the assistance of a traditional image reading device. The image reading devices (e.g., scanner, barcode reader) are present in any store so that additional hardware is not typically required. Since the method described in Hui is exclusively based on authentications via data transmissions carried out via a radio network or WAP data transmission, Hui does not teach or suggest the aforementioned features recited in the claims. As such, the rejection under 35 U.S.C §102 is improper and should be withdrawn.

Furthermore, Hoffberg fails to solve the deficiencies of Hui, discussed above. Moreover, the reliance on Hoffberg in claim 12 renders the rejection inconsistent with that recited in claim 1. It is not understood by Applicant how the Office Action claims earlier that Hui teaches "displaying graphically coded output information, via the image output device, suitable for authenticating a user, and reading the graphically coded output information into the trader station by an image reading device" with regard to claim 1, but yet the reference does not teach the coding/decoding algorithms that produce the graphically coded information in the first place. In the passages cited in the Office Action, Hoffberg merely describes various encryption techniques (col. 160, lines 20-38), and col. 2, lines 63-65 references an article describing scanner techniques in a Human Interface machine. Similarly, col. 15, lines 26-28 in Hoffberg incorporates by reference image recognition techniques. Aside from the face that none of these references apply
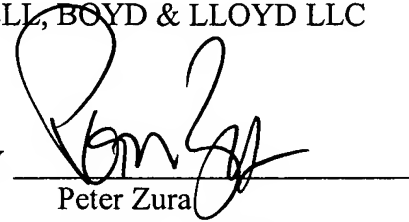
to the present claims, Applicant respectfully submits that the wholesale citation of references without providing details on their applicability is improper. It follows that there is no teaching, suggestion or motivation to combine these references as well. Accordingly, the rejection under 35 U.S.C. §103 should be withdrawn.

In light of the above, the Applicants respectfully submit that the rejections are improper and should be withdrawn. As such, claims 1-12 of the present application are patentable over the art of record. Therefore, Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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Dated: December 19, 2005